Review Comments
Phase 2 Basin 2 Storm Water Monitoring Plan
Burgard Industrial Park – SSI Area
Portland, Oregon
Dated September 16, 2015

Submitted December 3, 2015

Following are the United States Environmental Protection Agency's (EPA) comments on the September 16, 2015 document entitled, Phase 2 Basin 2 Storm Water Monitoring Plan, Burgard Industrial Park – SSI Area, Portland, Oregon prepared by Bridgewater Group, Inc. The Schnitzer Steel Industries Site (ECSI 2355) is located within the Schnitzer Burgard Industrial Park, and discharges to the Willamette River at approximate RM4.0E (T-4/International Slip GeoRegion).

Stormwater discharges from the Schnitzer Steel Industries (SSI) site are regulated under a National Pollutant Discharge Elimination System (NPDES) 1200Z permit, and Basin 2 storm water treatment improvements are being implemented pursuant to a Tier II Corrective Action Plan. EPA understands the objective of the memorandum was to present the Phase 2 Basin 2 stormwater monitoring plan to the Oregon Department of Environmental Quality (DEQ). The purpose of the monitoring plan is to assess the effectiveness of improvements that have been made to the stormwater treatment system within the basin.

Comments

1. Sampling Location, Frequencies, and Conditions:

    a. The JSCS guidance (Section D.5.2) states that at least four separate storm events per year should be sampled for screening purposes. The SAP should be amended to include a minimum of four sampling events. The effectiveness of the treatment system cannot be demonstrated by collecting only two samples.

    b. The type of sample that will be collected (i.e., grab or composite) should be clarified. If a composite sample is collected, the SAP should specify whether it will be a time-weighted or flow-weighted sample. The treatment effectiveness may vary throughout an event and it is recommended that composite samples be collected to account for variations in system performance.

2. Table 2 Water Analytical Laboratory Detection Limits Basin 2 Storm Water Monitoring Plan:

    a. The outfall from this location discharges to AOPC 3, which has the following COIs: arsenic, cadmium, copper, mercury, silver, tributyl tin, zinc, PAHs, phenol, PCBs, DDx, and delta-HCCH. Accordingly, phenol should be added to the list of analytes tested during stormwater monitoring.

    b. Section D.6 of the JSCS states that stormwater discharge data should be screened

against SLVs presented in the JSCS. The COIs need to be detected at concentrations sufficiently low to allow for direct comparison to the SLVs. Specifically, the detection limits listed for arsenic, cadmium, silver, tributyl tin, dioxins, and some chlorinated pesticides are above SLVs. Modifications to analytical methods should be considered to allow for appropriate comparison to SLVs.

c. The results of stormwater monitoring should be compared to the Preliminary Remediation Goals (PRGs) of RAOs 3 and 7, which provide remedial objectives related to surface water exposures.